

United States District Court
Eastern District of Texas Beaumont

Motion For Leave For Extension of Time
In Serving The Defendants with Process

John Mark Whatley et al §

✓

1:21-cv-549

Zena Stephens, et al §

1) Plaintiffs used due diligence in regards to serving the defendants, plaintiffs are only lay-men of the laws and at this point of litigation, are being denied access to law library, and confined in county jail.

A) Mailed out via U.S. Postal Mail, Postage Pre-Paid with self-addressed, stamped envelope for return in the following order 1) Zena Stephens Rule 4 - Notice of a lawsuit and request to waive service of summons & Rule 4 - Waiver of the Service of Summons on Nov. 15, 2021 addressed to 1085 Pearl St. BMT. Tx. 77701

2) CEO of Heefe Group, same as above Rule 4 - Notice mailed out on Nov. 22, 2021 addressed to; 10880 Linpage Pl. Saint Louis MO 63132

3) Senior Capt. Mitter, Lieutenant Ford 1st Shift Supervision, Lieutenant Nabors 2nd Shift Supervision same as above Rule 4 - Notice.

mailed out on Nov. 22nd 2021 addressed to;
JCCF

5030 Hwy 69, South BMT Tex. 77705

y) Chief J. Shaubberger same as above Rule 4-Notice
mailed out on Dec. 13, 2021 addressed to;
J.CCF

5030 Hwy 69, South BMT Tex. 77705

B) after extensive research of Keefe Group are
registered agents of Cogency Global INC.

9666 Olive Boulevard, Suite 690
Saint Louis Missouri 63132

Keefe Commissary Network LLC, d/b/a Access Corrections;
Global Tel-Link Phones; Smart Communications Holding
INC. d/b/a smartjailmail.com.

THC Holdings INC. is the holding company of Keefe
Group LLC which is the parent company of Keefe Comm.
Network; Centric Group LLC; Turn Key Health Clinics
LLC; my Care PAK / Secure Pak, TPO, CSR &
more!

Considering the fact that Keefe Group has made
a monopoly and Sheriff has chose to send profits from
commissary, phones and smartjailmail.com. to Missouri
instead of that money staying in this county. This is a
clearly antitrust law violation. Sherman / Clayton
Antitrust Act.

This action falls under 15 USC § 22 (Clayton Act), also 28 USC § 1697 (multiparty, multiforum actions) this action will be complex and will definitely entail State long-arm statute.

see FRCP 4(k)(2) is a special-purpose long-arm law, akin to state long-arm statutes, that authorizes extra-territorial jurisdiction whenever its exercise would be consistent with the requirements of due process. Adams v. Unione Mediterranea di Sicurtà, 364 F.3d 646, 650-51 (5th Cir. 2004). see Saud v. Northrop Grumman Corp., 427 F.3d 271, 275 (4th Cir. 2005)

c) Plaintiff's claims or to have suffered great humiliation, embarrassment and mental suffering as a result of the agents unlawful conduct, Teeth to the constitutional guarantees against unlawful conduct of Jefferson County Correctional Facility officials officers exercising their authority, cannot ignore the fact that power, once granted, does not disappear like a magic gift when it is wrongfully used. An agent/officer acting - albeit unconstitutionally - in the name of the County (Jefferson) possesses a far greater capacity for harm than an individual trespasser exercising no authority other than his own. The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws, whenever he receives an injury. Marbury v. Madison, 1 Cranch 137, 163, 2 LEd 60 (1803)

Declaration Under Penalty of Perjury

I declare under penalty of perjury that I am the plaintiff. I have read this motion or had it read to me, and the information in this motion is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date Jan. 21, 2022

John Mark Whalley
JCCF # 199743
5030 Hwy 69, South
Beaumont TX. 77705

To U.S. District Clerk
300 Willow Rm 104
Beaumont Texas 77701

1/21/2022

RE: Whatley et al v Stephens
1:21 cv 549

Dear Clerk

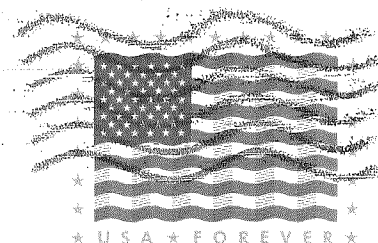
Please find enclosed plaintiff's Motion For Leave
For Extension Of Time In Serving The Defendants with
Process, please docket the above motion into the Court's
record in the above entitled and numbered action
Thank you

Sincerely

John Mark Whatley # 199743

John Mark Whatley #199743
JCCF
5030 Hwy 69, South
Beaumont Tx. 77705

24 JAN 2022 PM 4 L



U.S. District Clerk
300 Willow, RM 104
Beaumont Texas 77701

77701-221725

